

CULBERTSON, WEISS, SCHETROMA AND SCHUG, P.C.
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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Voices for Independence and, Paul
Pecunas; on behalf of themselves and
all others similarly situated,

Plaintiffs

v.

City of Meadville, Pennsylvania,

Defendant

Civil Action No: 04-328 Erie

Hon: Sean McLaughlin, United States
District Judge:

JOINT MOTION FOR EXTENSION OF DISCOVERY

Now, August 8, 2005, come counsel for the Plaintiffs and for the Defendant in the above captioned action and move the court as follows:

1. On February 15, 2005, this court entered a case management order, setting time limits for pretrial procedures. The time for completion of discovery was set for August 15, 2005.
2. Counsel for the defendant had planned to depose plaintiffs' witnesses during August, before the close of discovery. However, this course of action will conflict with a planned vacation of plaintiffs' counsel.
3. Both counsel are amenable to extension of the time for discovery, and of the other matters which were scheduled in the case management order.

Wherefore, both counsel move the court to enter the accompanying proposed order, extending the time for discovery and other pretrial procedures by 30 days.

HEBERLE & FINNEGAN

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